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5 *Attorneys for Plaintiffs*

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8 **UNITED STATES DISTRICT COURT FOR THE**

9 **CENTRAL DISTRICT OF CALIFORNIA**

10

11

12 SANDRA KIRKMAN, CARLOS
13 ALANIZ, individually and successors-in-
14 interest to JOHN ALANIZ, deceased,

15 Plaintiff,

16 vs.

17 STATE OF CALIFORNIA, RAMON
18 SILVA, and DOES 1-10, inclusive,

19 Defendants.

20

21 Case No. 2:23-cv-07532-DMG-SSC
22 [Hon. Dolly M. Gee]

23

24 **PLAINTIFFS' PROPOSED**

25 **VERDICT FORM**

26

27 Pre-Trial Conference
28 March 25, 2025, 2:00 p.m.

1 Trial
April 15, 2025, 8:30 a.m.

1 **PLEASE TAKE NOTICE** that the Plaintiffs hereby submit their proposed verdict
2 form for the trial of this matter.

3 Respectfully submitted,

4 DATED: March 14, 2025

LAW OFFICES OF DALE K. GALIPO

7 By: /s/ Cooper Alison-Mayne
8 Dale K. Galipo, Esq.
9 Cooper Alison-Mayne
 Attorneys for Plaintiffs

1 We, the jury in the above-entitled action, find the following:

2

3 **FOURTH AMENDMENT EXCESSIVE FORCE CLAIM**

4 **QUESTION 1:** Did Ramon Silva use excessive or unreasonable force against John
5 Alaniz?

6

7 _____ YES _____ NO

8

9 *If you answered "Yes" to Question 1, please answer Question 2.*

10 *If you answered "No" to Question 1, please proceed to Question 3.*

11

12 **QUESTION 2:** Was Ramon Silva's use of excessive or unreasonable force a cause of
13 injury, harm, damage, or death to John Alaniz?

14

15 _____ YES _____ NO

16

17 *Please proceed to Question 3.*

18

19 **BATTERY CLAIM**

20 **QUESTION 3:** Did Ramon Silva commit a battery upon John Alaniz?

21

22 _____ YES _____ NO

23

24 *If you answered "Yes" to Question 3, please answer Question 4.*

25 *If you answered "No" to Question 3, please proceed to Question 5.*

1 **QUESTION 4:** Was Ramon Silva's battery a cause of injury, harm, damage, or death to
2 John Alaniz?

3 _____ YES _____ NO
4

5
6 *Please proceed to Question 5.*

7
8 **NEGLIGENCE CLAIM**

9 **QUESTION 5:** Was Ramon Silva negligent towards John Alaniz?
10

11 _____ YES _____ NO
12

13 *If you answered "Yes" to Question 5, please answer Question 6.*
14

15 *If you answered "No" to Question 5, please proceed to Question 10.*

16 **QUESTION 6:** Was Ramon Silva's negligence a cause of injury, harm, damage, or death
17 to John Alaniz?
18

19 _____ YES _____ NO
20

21 *If you answered "Yes" to Question 6, please answer Question 7.*
22

23 *If you answered "No" to Question 6, please proceed to Question 10.*

1

2 **QUESTION 7:** Was John Alaniz negligent?

3

4 _____ YES _____ NO

5

6 *If you answered "Yes" to Question 7, please answer Question 8.*

7 *If you answered "No" to Question 7, please proceed to Question 10.*

8

9 **QUESTION 8:** Was John Alaniz's negligence a cause of his own injury, harm, damage,
10 or death?

11

12 _____ YES _____ NO

13

14 *If you answered "Yes" to Question 8, please answer Question 9.*

15 *If you answered "No" to Question 8, please proceed to Question 10.*

16

17 **QUESTION 9:** What percentage of negligence that was a cause of John Alaniz's death do
18 you assign to Ramon Silva, and what percentage of negligence that was a cause of John
19 Alaniz death do you assign to John Alaniz? (Your total should equal 100%).

20

Ramon Silva _____

21

John Alaniz _____

22

23

Total 100%

24

25 *Please proceed to Question 10.*

26

27

28

If you answered "Yes" to Question 2, please answer Question 10. Otherwise, proceed to the Damages section, below.

Question 10: Did Ramon Silva violate the Bane Act?

_____ YES _____ NO

Please proceed to the Damages section, below.

DAMAGES

If you answered "Yes" to Question 2, answer Question 11.

If you answered "Yes" to Question 4, Question 6, or Question 10, answer Question 12.

QUESTION 11: What are John Alaniz's damages for his pre-death pain and suffering and loss of life?

Pre-death pain and suffering \$ _____
Loss of Life \$ _____

QUESTION 12: What are the Plaintiffs' wrongful death damages for the loss of John Alaniz?

Sandra Kirkman's past wrongful death damages: \$ _____

Carlos Alaniz's future wrongful death damages: \$ _____

Sandra Kirkman's past wrongful death damages: \$ _____

1
2 Carlos Alaniz's future wrongful death damages: \$ _____
3
4

5 *Please sign and date the verdict form and return it to the Court.*
6

7 Date: _____
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10 Jury Foreperson
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